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Date: 9/1/04

To: Dr. William T. Hogarth
Asst. Admin. for Fisheries

Fax number: 301-427-2572

From: Chip Groat, Director, U.S. Geological Survey

Number of pages (including transmittal sheet):

4

Comments:

See Attached Response to your June 16, 2004 letter requesting comments regarding the petition for rulemaking to protect deep-sea coral and sponge habitats in the U.S. Exclusive Economic Zone.



United States Department of the Interior

U.S. GEOLOGICAL SURVEY

Office of the Director

Reston, Virginia 20192

In Reply Refer To:

Mail Stop 915B

#20040456

SEP - 1 2004

Dr. William Hogarth
Assistant Administrator for Fisheries
United States Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, Maryland 20910

Dear Dr. Hogarth:

This is in response to your letter dated June 16, 2004, requesting comments regarding the petition for rulemaking to protect deep-sea coral and sponge habitats in the U.S. Exclusive Economic Zone (EEZ). Listed below are our comments:

1. Due to the limited research available, the location, distribution, status, and health of deep coral and sponge habitats are poorly understood. A request for the National Oceanic and Atmospheric Administration (NOAA) to identify, map, and list all known areas containing high concentrations of deep corals and sponge habitats is reasonable. The U.S. Geological Survey (USGS) is at present putting together an assessment of the geographic location of all deep corals and will be glad to make this widely available when complete and collaborate on future efforts.
2. We agree that deep corals are valuable habitats but they are also potential sources of future medicines, and recorders of global climate change because they live so long. We have a lot to learn about deep coral ecosystems and so a request to establish a research program for deep corals also seems sensible. This is an area also called out for attention in the preliminary Ocean Commission report. Additional issues that need to be researched include the structure, function and biodiversity of deep coral ecosystems; the role of microbial symbionts in deep versus shallow reefs; and the spatial scale of recruitment of deep coral larvae.
3. Bottom trawl marks have been identified in deep coral and sponge environments. We know significant damage occurs from bottom-trawling fishing practices (McDonough and Puglise, 2003, Summary: Deep-Sea Corals Workshop); however a variety of threats (e.g., temperature and salinity shifts) may also adversely affect deep coral and sponge ecosystems. Thus, an evaluation of the various stressors, both natural and anthropogenic, is suggested before concentrating on trawling as the only or major issue.

Dr. William Hogarth

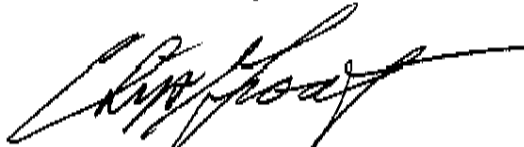
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4. The request by Oceana to NOAA to fund and initiate research to restore deep coral and sponge habitat is a reasonable request. Such research has already been initiated in shallow coral and sponge environments by the National Park Service, the USGS, and NOAA scientists. Techniques learned from our efforts in the Marine Sanctuaries and National Marine Parks might be transportable to deep coral environments. This request, although reasonable, will be expensive since mapping and research activities will have to be carried out in deep water.

Any decision concerning whether to designate deep-coral areas as "essential fish habitat" and "habitat areas of particular concern" is a regulatory decision and should be made by the appropriate agency (e.g., NOAA) using well-established criteria. The same comment applies to the request to monitor bycatch in areas identified as deep-sea coral and sponge habitat.

If you have any additional questions, please contact Dawn L. Lavoie, Associate Program Coordinator, Coastal and Marine Geology Program on 703-648-6511 or e-mail: dlavoie@usgs.gov.

Sincerely,



Charles G. Groat
Director



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910
THE DIRECTOR

JUN 16 2004

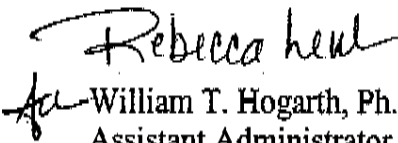
Charles G. Groat, Ph.D., Director
U.S. Geological Survey, Headquarters
John W. Powell Federal Building
12201 Sunrise Valley Drive
Reston, Virginia 20192

Dear Charles G. Groat:

I am enclosing the petition for rulemaking to protect deep-sea coral and sponge habitats in the U.S. EEZ that the National Marine Fisheries Service recently received from Oceana. We have sent a notice of receipt of this petition to the *Federal Register* and have requested public comments. The public comment period ends August 13, 2004. Because of the importance and complex nature of this issue, I am sending this petition to several Federal agencies and science organizations to solicit their comments.

I would appreciate receiving your views on this very important matter. Please submit your comments either electronically at DSC-EFH@noaa.gov or fax them to (301) 427-2572. Feel free to contact Tom Hourigan in our Office of Habitat Conservation (301-713-0299) if you have questions. Thank you for your attention to this important issue.

Sincerely,


William T. Hogarth, Ph.D.
Assistant Administrator
For Fisheries

Enclosure

cc: US Geological Service
US Minerals Management Service
US Fish and Wildlife Service
National Science Foundation
American Association for the Advancement of Science
National Academy of Sciences

